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Attorneys for Defendant SUNGAGE FINANCIAL, LLC

CAMERON BEATTY, individually
and on behalf of all others similarly
situated,

Plaintiff,

v.

SUNGAGE FINANCIAL, LLC, a
Massachusetts limited liability
company; NBT BANK, N.A., a New
York Corporation; SUNMADE
ENERGY, LLC, a California limited
liability company; and DOES 1
through 50, inclusive,

Defendants.

Case No. 1:25-cv-00645-KES-SKO

**STIPULATION AND ORDER FOR
DEFENDANT SUNGAGE
FINANCIAL, LLC TO CONTINUE
RESPONSE DEADLINE TO the
AMENDED COMPLAINT**

(Doc. 33)

Filing Date: May 30, 2025
Trial Date: None set

1 Plaintiff Cameron Beatty and Defendant Sungage Financial, LLC (“Sungage”
2 or “Defendant Sungage”), by and through their counsel, hereby make the following
3 stipulations regarding the deadline for Defendant Sungage to respond to Plaintiff’s
4 Amended Complaint.

5 1. WHEREAS, on August 18, 2025, the Parties filed a Joint Stipulation
6 and Proposed Order that included language stating that Plaintiff shall have until
7 September 30, 2025 to file an amended complaint (Dkt. No. 24);

8 2. WHEREAS the Joint Stipulation and Proposed Order filed on August 18,
9 2025 also included language that Defendants deadline to respond to the amended
10 complaint would be October 30, 2025 (Dkt. No. 24);

11 3. WHEREAS on August 18, 2025, the Court entered an Order granting that
12 stipulation (Dkt. No.25);

13 4. WHEREAS Plaintiff did not file his amended complaint until October 22,
14 2025 (Dkt. No. 27);

15 5. WHEREAS the Parties previously agreed that Defendants’ new deadline to
16 respond to the amended complaint should be December 5, 2025, and the Court entered
17 an Order granting that stipulation (Dkts. 30-31);

18 6. WHEREAS, the parties want to pursue additional meet and confer efforts
19 before Sungage files its response, and given the holiday season, the parties agree to
20 extend Sungage’s response deadline to January 9, 2026;

21 7. THEREFORE, subject to the Court’s approval, the Parties HEREBY
22 STIPULATE and agree that Defendant Sungage’s deadline to respond to the amended
23 complaint is January 9, 2026.

24
25 Dated: December 4, 2025

LAW OFFICES OF JASON M. INGBER

26
27 By: /s/Jason M. Ingber (with email authorization)
28 Jason M. Ingber
Serach B. Shafa

Attorneys for Plaintiff
Cameron Beatty

Dated: December 4, 2025

WIECHERT, MUNK & GOLDSTEIN, PC

By: /s/Jessica Munk
Jessica C. Munk
David W. Wiechert
Attorneys for Defendant
Sungage Financial, LLC

Dated: December 4, 2025

MURPHY & KING

By: /s/ Dan Rabinovitz (with email authorization)
Daniel J. Goodrich, PHV
Daniel M. Rabinovitz, PHV
Attorneys for Defendant
Sungage Financial, LLC

ORDER

Based on the Parties' foregoing Stipulation (Doc. 33), and good cause appearing Fed. R. Civ. P. 16(b)(4)), the Court hereby ORDERS that Defendant Sungage Financial, LLC's deadline to respond to the amended complaint is continued to **January 9, 2026**.

IT IS SO ORDERED.

Dated: **December 5, 2025**

/s/ Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE